

DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: DEC 21 2016

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

SHAHBAZ KHAN,

Defendant.

INDICTMENT

16 Cr.

16 CRIM 840.

COUNT ONE

(Narcotics Importation Conspiracy)

The Grand Jury charges:

1. From at least in or about August 2016, up to and including in or about November 2016, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, SHAHBAZ KHAN, the defendant, who was first brought to and arrested in the Southern District of New York, and whose point of entry into the United States was the Southern District of New York, together with others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and object of the conspiracy that SHAHBAZ KHAN, the defendant, and others known and unknown, would and did distribute, and possess with intent to distribute, a

controlled substance, to wit, one kilogram and more of mixtures and substances containing a detectable amount of heroin, intending, knowing, and having reasonable cause to believe that such substances would be imported into the United States from a place outside thereof, in violation of Sections 812, 959(a), 959(d), 960(a)(3), 960(b)(1)(B), and 963 of Title 21, United States Code.

(Title 21, United States Code, Sections 959(a), 959(d), and 963; Title 18, United States Code, Section 3238.)

COUNT TWO
(Attempted Narcotics Importation)

The Grand Jury further charges:

4. From at least in or about August 2016, up to and including in or about November 2016, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, SHAHBAZ KHAN, who was first brought to and arrested in the Southern District of New York, and whose point of entry into the United States was the Southern District of New York, intentionally and knowingly did attempt to distribute a controlled substance, intending, knowing, and having reasonable cause to believe that such substance would be imported into the United States from a place outside thereof, in violation of Sections 959(a) and 963 of Title 21, United States Code.

5. The controlled substance the defendant attempted to distribute was one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Sections 812, 960(a)(3), and 960(b)(1)(B) of Title 21, United States Code.

(Title 21, United States Code, Sections 959(a), 959(d), and 963; Title 18, United States Code, Section 3238.)

FORFEITURE ALLEGATION

11. As a result of committing the controlled substance offenses alleged in Counts One and Two of this Indictment, SHAHBAZ KHAN, the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853 and 970, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts One and Two of this Indictment.

Substitute Assets Provision

13. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

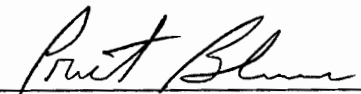
- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Sections 853(p) and 970, to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 853 and 970; and Title 28, United States Code, Section 3461(c).)


FOREPERSON


PREET BHARARA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

SHAHBAZ KHAN,

Defendant.

INDICTMENT

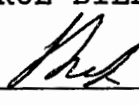

16 Cr.

(21 U.S.C. §§ 959(c), 963; and
18 U.S.C. § 3238.)

PREET BHARARA

United States Attorney.

A TRUE BILL



Foreperson.

TRUE BILL & INDICTMENT

MAG. JUDGE RONALD L. ELLIS

12/21/16 JS.

Wheeled to J. Schofield.